

- IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

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JAY CONNORS

Case No. 2:24-cv-645-MHC

v.

Wilshire Real
Estate Services

- **Motion for Extension for Wilshire Real Estate Services to Obtain Legal Counsel**

The Defendant in the above matter asks the Court to respectfully grant an extension for the defendant to obtain legal counsel:

1. Zach Mitchell, the sole member of Wilshire Real Estate, has approached multiple lawyers and has received similar financial requirements to obtain legal counsel for around \$10,000. Zach Mitchell is applying for short-term funding to cover costs through Family and Commercial sources.
2. The defendant has limited resources due to back taxes, which amount to almost 20,000 and must be paid next month, and the normal cost of running the business.
3. Wilshire Real Estate Services LLC has a limited number of employees. The Sole Member must continue normal business activities and pursue consultation and funding, which resulted in the late filing of this motion.
3. The Defendant would ask the court for a 45-day extension to obtain legal counsel and pursue options to be financially prepared to defend against default in this case.

Dated:

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Zach Mitchell', written over a horizontal line.

Zach Mitchell

Wilshire Real Estate Services LLC

722 Carthwright Dr Charleston, SC 29414

Telephone: 843-834-0448

E-mail: wilshiresellssc@gmail.com

- TO: Dave A. Maxfield

P.O. Box 11865

Columbia, SC 29211

Attorneys for Jay Connors